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8/5/1987

CHEMICAL PROCESSORS, INC.
5501 AIRPORT WAY SO.
SEATTLE, WASHINGTON 98108
PHONE: (206) 767-0350



August 5, 1987

Laurence Ashley
State of Washington
Department of Ecology
Northwest Region Office
4350 - 150th Avenue N.E.
Redmond, WA 98052

Dear Mr. Ashley:

We have reviewed your June 22, 1987 letter regarding the May 6, 1987 Washington Department of Ecology inspection of the Chemical Processors, Inc., Pier 91 facility (WAD000812917). The following comments are in response to the numbered observations and questions raised in your letter:

1. The receiving oil/water separator does not have an overflow sensor and it is felt by Chempro that one is not necessary due to the manner in which the separator is utilized. This opinion is based on two major factors:

   a. The unit is manned by a Chempro operator during normal operating hours and whenever oils and oily water are received at the facility.

   b. The drainage in the area of the separator is designed to contain any incidental spillage or accidental overflow within the sumps, pipe alleys and bermed containment system.

   Oily waters are discharged from incoming trucks directly into the separator unit. Oil loads are pumped directly through a manifold system from the trucks into the facility tanks bypassing the separator unit. These [illegible] are carried out only when the facility is manned and only when a Chempro operator is stationed at the separator. The operator is in visual contact [illegible]

the separator unit and the truck operator at all times during receiving. Any spillage or excess inflow that would tax the capacity of the unit would be contained within the sumps that feed into the separator unit and remain within the containment system surrounding the receiving area.

2. The insulation surrounding the piping in the boiler room and in the entire facility was examined by a certified asbestos worker (Nate Mathews, Facility Manager). Prior to your inspection, the asbestos insulation at the Pier had all either been removed or encapsulated as required. The exposed pipe insulation observed in the boiler room was fiberglass and has since been wrapped.

3. A backflow prevention device was installed in 1978 on the water line at the northwest corner of Building #26. The equipment is inspected annually by the Port of Seattle for the City of Seattle Water Department, most recently on July 23, 1986. We are evaluating the need for additional backflow prevention devices.

4. The area between the Pacific Northern Oil Company pump house and the facility Tank #102 is designed to collect rain water and any incidental spillage of oil. This area known as the pipe alleys is completely contained. Any collected material is manually pumped to the Seattle Metro sewer via an oil/water separator if and when it meets Metro's discharge criteria. If it does not meet the discharge criteria it is pumped into one of the facility treatment tanks. There are no uncontrolled discharges from this area. Chempro will formally advise Pacific Northern Oil Company of your comments and concerns with respect to their pipe valve leakages.

5. On July 29, 1987, we submitted a letter to you requesting an extension until September 18, 1987 to update the Facility Closure Plan with cost estimates for contaminated soil/water determination, removal and disposal. Today, we received your August 3, 1987 letter granting our request.

6. The Facility Contingency Plan has been corrected as per your comments and is enclosed with this letter. Copies of the plan are being submitted to the appropriate local emergency response agencies.

7. Phenol is oxidized at the Pier 91 facility by one of two processes:

   a. Permanganate is used for wastes containing less than approximately 500 ppm phenol.

b. Hydrogen peroxide is used for wastes with greater than 500 ppm phenol.

The permanganate oxidation is carried out at 140-180°F and the reaction products are quinone, hydroquinone, maleic acid, mesotartaric acid and manganese dioxide. Oxidation with hydrogen peroxide is carried out at 140°F with ferrous sulfate added as a catalyst. The products of this reaction are hydroquinone, quinone, and o-, m- and p-Phthalic acids.

If you have any questions or comments regarding this letter, please contact me.

Sincerely,

Peter K. Ressler
Compliance Specialist

PKR:tks

Enclosure

cc: W. E. Fisher
M. P. Keller
D. F. Stefani
R. C. Morton
N. E. Mathews
M. N. Miller